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12 *Attorneys for Plaintiffs Sharp Electronics Corporation,  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

17 SHARP ELECTRONICS CORPORATION;  
SHARP ELECTRONICS MANUFACTURING  
COMPANY OF AMERICA, INC.,

Case No. 13-cv-01173-SC  
Case No. 07-cv-05944-SC  
MDL No. 1917

Plaintiffs,

V

21 HITACHI, LTD.; HITACHI DISPLAYS, LTD.;  
22 HITACHI AMERICA, LTD.; HITACHI ASIA,  
23 LTD.; HITACHI ELECTRONIC DEVICES (USA),  
24 INC.; SHENZHEN SEG HITACHI COLOR  
25 DISPLAY DEVICES, LTD.; LG ELECTRONICS,  
26 INC.; LG ELECTRONICS USA, INC.; LP  
27 DISPLAYS INTERNATIONAL, LTD.;  
28 LG.PHILIPS DISPLAYS HOLDING B.V.;  
LG.PHILIPS DISPLAYS INTERNATIONAL B.V.;  
MERIDIAN SOLAR & DISPLAY CO., LTD.;  
PANASONIC CORPORATION; PANASONIC  
CORPORATION OF NORTH AMERICA;  
PANASONIC CONSUMER ELECTRONICS CO.;  
MT PICTURE DISPLAY CO., LTD.;  
MATSUSHITA ELECTRONIC CORPORATION  
(MALAYSIA) SDN BHD.; BEIJING

**DECLARATION OF CRAIG A.  
BENSON IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO SEAL PORTIONS OF  
ITS SECOND AMENDED  
COMPLAINT**

**CIVIL L.R. 79-5**

1 MATSUSHITA COLOR CRT CO., LTD.; PT.MT  
2 PICTURE DISPLAY INDONESIA; SAMSUNG  
3 SDI CO., LTD.; SAMSUNG SDI AMERICA, INC.;  
4 SAMSUNG SDI (MALAYSIA) SDN BHD.;  
5 SAMSUNG SDI MEXICO S.A. DE C.V.;  
6 SAMSUNG SDI BRASIL LTDA.; SHENZHEN  
7 SAMSUNG SDI CO., LTD.; TIANJIN SAMSUNG  
8 SDI CO., LTD.; SAMSUNG SDI (HONG KONG),  
9 LTD.; TOSHIBA CORPORATION; TOSHIBA  
10 AMERICA, INC.; TOSHIBA AMERICA  
11 CONSUMER PRODUCTS LLC; TOSHIBA  
12 AMERICA ELECTRONIC COMPONENTS, INC.;  
13 TOSHIBA AMERICA INFORMATION  
14 SYSTEMS, INC.; TOSHIBA DISPLAY DEVICES  
15 (THAILAND) COMPANY, LTD.; THOMSON SA  
16 (N/K/A TECHNICOLOR SA); THOMSON  
17 CONSUMER ELECTRONICS, INC. (N/K/A  
18 TECHNICOLOR USA, INC.); VIDEOCON  
19 INDUSTRIES, LTD.; TECHNOLOGIES  
20 DISPLAYS AMERICAS LLC,  
21  
22 Defendants.  
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I, Craig A. Benson, hereby declare as follows:

1. I am an active member in good standing of the bars of the State of Maryland, the State of New York, and the District of Columbia and on March 20, 2013 was granted leave to appear *pro hac vice*. (Dkt. No. 12.) I am associated with the firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, counsel to Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc. (collectively, “Sharp”). I submit this Declaration in support of Sharp’s Administrative Motion to Seal Portions of Plaintiffs’ Second Amended Complaint (“Motion”). I have personal knowledge of the facts stated herein and could competently testify to these facts if called as a witness.

2. Portions of Sharp's Second Amended Complaint contain discussion, analysis, references to, or information taken directly from, material designated by a Defendant or Defendants in this matter as "Confidential" or "Highly Confidential" pursuant to the Protective Order applicable in this action. Specifically, portions of paragraphs 194-197, 237, 238, and 257 of Sharp's Second Amended Complaint contain such confidential material.

3. Sharp seeks to submit the above material under seal in good faith in order to comply with the Protective Order in this action and the applicable Local Rules. Because the information Sharp seeks to submit under seal has been designated as Confidential or Highly Confidential by another party, Sharp is filing the accompanying Motion, and will be prepared to file an unredacted Second Amended Complaint in the public record if required by Civil Local Rule 79-5(e).

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed this 13th day of June, 2014 in Washington, DC.

*/s/ Craig A. Benson*

Craig A. Benson